

FOLEY & LARDNER LLP

Jeffrey R. Blease (CA Bar. No. 134933)

Tel: (617) 226-3155; jblease@foley.com

Thomas F. Carlucci (CA Bar No. 135767)

Tel: (415) 984-9824; tcarlucci@foley.com

Shane J. Moses (CA Bar No. 250533)

Tel: (415) 438-6404; smoses@foley.com

Emil P. Khatchatourian (CA Bar No. 265290)

Tel: (312) 832-5156; ekhatchatourian@foley.com

Ann Marie Uetz (admitted *pro hac vice*)

Tel: (313) 234-7114; auetz@foley.com

Matthew D. Lee (admitted *pro hac vice*)

Tel: (608) 258-4203; mdlee@foley.com

555 California Street, Suite 1700

San Francisco, CA 94104-1520

*Counsel for the Debtor
and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**STIPULATION TO CONTINUE HEARING
ON THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' EX PARTE
APPLICATION FOR ENTRY OF AN
ORDER UNDER FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004**

Judge: Hon. William J. Lafferty

1 **INTRODUCTION**

2 The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor
3 in possession (the “Debtor” or “RCBO”) in the above-captioned chapter 11 bankruptcy case (the “Chapter
4 11 Case”) and the Official Committee of Unsecured Creditors appointed in the Chapter 11 Case (the
5 “Committee” and together with the Debtor the “Parties”) by and through their respective counsel of record,
6 hereby stipulate and agree as follows.

7 **RECITALS**

8 A. On July 14, 2023, the Committee filed its *The Official Committee of Unsecured*
9 *Creditors’ Ex Parte Application for Entry of an Order Under Federal Rule of Bankruptcy Procedure*
10 *2004* [Docket No. 239] (the “2004 Application”).

11 B. At a hearing on July 18, 2023, the Court approved the agreement of the Parties to set the
12 2004 Application for hearing on August 8, 2023, at 9:00 a.m., with any opposition or response to be
13 filed not later than August 1, 2023, and any reply to be filed not later than August 4, 2023.

14 C. The Parties have further met and conferred regarding the 2004 Application, and wish to
15 continue the hearing on the 2004 Application, as set forth herein.

16 **STIPULATION**

17 Based on the foregoing, the Parties hereby stipulate and agree as follows:

18 1. The hearing on the 2004 Application shall be continued to September 12, 2023, at 9:00
19 a.m., subject to the approval of the Court.

20 2. Any opposition or other response to the 2004 Application shall be filed not later than
21 September 5, 2023, and any reply shall be filed not later than September 8, 2023.

22 3. The Parties request that the Court enter an order in the form attached hereto as **Exhibit A**
23 approving this Stipulation and the dates agreed.

24 [Signatures on following page]
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26
27
28

STIPULATION

1 **SO STIPULATED:**

2 Dated: August 1, 2023

FOLEY & LARDNER LLP

3
4 /s/ Shane J. Moses
Shane J. Moses
Attorneys for the Debtor

7 **SO STIPULATED:**

8 Dated: August 1, 2023

LOWENSTEIN SANDLER LLP

9
10 /s/ Michael A. Kaplan
Michael A. Kaplan
Attorneys for the
Official Committee of Unsecured Creditors

STIPULATION